

FINAL DRAFT/PROPOSED CAAPP PERMIT
Amcor Flexibles Healthcare, Inc.
I.D. No.: 097115ABC
Application No.: 95120127
June 18, 2004

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Amcor Flexibles Healthcare, Inc.
Attn: Tom Haney, VP Operations
1919 South Butterfield Road
Mundelein, Illinois 60060

<u>Application No.:</u> 95120127	<u>I.D. No.:</u> 097115ABC
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 16, 2003
<u>Operation of:</u> Medical Packaging Manufacturing	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date:</u> DATE
<u>Source Location:</u> 1919 South Butterfield Road, Mundelein, Lake County	
<u>Responsible Official:</u> Tom Haney, VP Operations	

This permit is hereby granted to the above-designated Permittee to OPERATE a medical packaging manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:jar

cc: Illinois EPA, FOS, Region 1

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Amcor Flexibles Healthcare, Inc.
1919 South Butterfield Road
Mundelein, Illinois 60060
847/362-9000

I.D. No.: 097115ABC
Standard Industrial Classification: 3081, Plastic Unsupported
Sheet and Film

1.2 Owner/Parent Company

Amcor Flexibles Healthcare, Inc.
1919 South Butterfield Road
Mundelein, Illinois 60060

1.3 Operator

Amcor Flexibles Healthcare, Inc.
1919 South Butterfield Road
Mundelein, Illinois 60060

Tom Haney
847/362-9000

1.4 General Source Description

Amcor Flexibles Healthcare, Inc. is located at 1919 South Butterfield Road in Mundelein. The source applies inks and coatings on plastic film for medical packaging.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CO	Carbon Monoxide
DRE	Destruction and Removal Efficiency
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
ft	Feet
g	Grams
gal	Gallon
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HWC	Hazardous Waste Combustor
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
L	Liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mg	Milligrams
mmBtu	Million British thermal units
mg	Micrograms
mmscf	Million standard cubic feet
mo	Month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants

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NIC	Notification of Intent to Comply
NOC	Notification of Compliance
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
POHC	Principal Organic Hazardous Constituent
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
RMP	Risk Management Plan
scf	Standard cubic feet
scm	Standard cubic meters
SO ₂	Sulfur Dioxide
TEQ	Toxic Equivalency Quotient
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

Tank-2 Solvent Storage Tank
Tank-3 MEK Storage Tank
Print Treaters
Slitters
Pallet Silos
Pallet Transport
Converting for Lamination
Converting for Extrusion
Waste Plastic Regrind
Waste Paper/Tyvek Compactor
Soak Tank

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a) (4)].
- b. Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a) (5)].

- c. Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].
- d. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1,

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until the renewal application for this permit is
submitted, pursuant to 35 IAC 201.212(a).

- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Line 501: Laminator	Laminator- Mode 1: Use of Compliant (35 IAC 218.204(c)) Coatings. Date of Construction: 1980	None
		Laminator- Mode 2: Use of Non-Compliant Coatings. Date of Construction: 1980 Modified (By Adding Catalytic Oxidizer): 1992	Permanent Total Enclosure with Quantum Catalytic Oxidizer
Group 2	Flexographic Printing Lines	<u>Printing Lines with Compliant Inks:</u> With Electric Dryers-In-Lines: 101, 107, 110, 112, 113, 114, 115, 118; With Natural Gas Dryer-Off-Lines 36 and 42 Date of Construction: Pre-1988	None
		<u>Printing Lines with Non-Compliant Inks:</u> Electric Dryer-In-Lines 111; Natural Gas Dryer-Off-line 42 Date of Construction: Pre-1988	Magnum Catalytic Oxidizer

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except the following as allowed by 35 IAC 212.123(b):

The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source, which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to Illinois EPA, Compliance Section.

5.2.7 CAM

The affected source is subject to CAM requirements under 40 CFR Part 64. CAM requirements are addressed further in Conditions 7.1.8, 7.2.8, and Attachment 3 of this permit.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

- a. Total HAP usage for the entire source is limited to the following:
 - i. Use less than 9.1 Mg (10.0 tons) per each rolling 12-month period of each individual HAP at the facility, including materials used for coating, printing, and clean-up operations.
 - ii. Use less than 22.7 Mg (25.0 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for coating, printing, and clean-up operations.
- b. The above federally enforceable limitations are established for purposes of considering this source as an area source, as described in 40 CFR Part 63.820(a)(2), Subpart KK National Emission Standards for the Printing and Publishing Industry.

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	149.32
Sulfur Dioxide (SO ₂)	0.031
Particulate Matter (PM)	0.63
Nitrogen Oxides (NO _x)	5.22
HAP, not included in VOM or PM	---
Total	155.201

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Potential to emit of HAP emissions from the source are limited to less than 10 tons per year of each HAP and less than 25 tons per year of any combination of HAP through production limits established in Condition 5.4.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 40 CFR 63.829(d), the owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) (see also Condition 5.4) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
- b. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the

permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for

determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation

quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e) (3); and

- vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 139 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 15.75 tons per season.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
Not applicable
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.
- b. The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Laminator (Line 501)

7.1.1 Description

The facility operates a laminator, which applies either a compliant or non-compliant coatings/adhesives to a plastic substrate. Raw materials used for lamination include various coatings, adhesives, solvents, and water. Solvents and water are used as a thinning agent and also for clean-up operations. Based upon use of compliant coating or non-compliant coating, the laminator operation is divided into two modes of operation: in mode 1 operation compliant coatings are applied and VOM emissions are not controlled by a control device; in mode 2 operation non compliant coatings are applied and VOM emissions captured and destroyed by a catalytic oxidizer. After application of coatings the plastic substrate is dried in a natural gas fired drier.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Line 501	Laminator- Mode 1: Use of Compliant (35 IAC 218.204(c)) Coatings	None
	Laminator- Mode 2: Use of Non-Compliant Coatings	Permanent Total Enclosure with Quantum Catalytic Oxidizer

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected laminator" for the purpose of these unit-specific conditions, is the laminator, which operates in mode 1 or mode 2 as described in conditions 7.1.1 and 7.1.2 above.
- b. The affected laminator is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification

commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- d. The affected laminator using compliant coatings (mode 1) at the source is subject to 35 IAC 218.204(c) for paper coatings which provides that:
 - i. No owner or operator of an affected laminator shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to paper. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/liter</u>	<u>lbs/gallon</u>
0.28	2.3
 - ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- e. The affected laminator using non-compliant coatings and controlled by an oxidizer (mode 2) shall comply with the following pursuant to 35 IAC 218.207(b)(1):

The coating line (laminator) is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line (laminator) and the control device has a 90 percent efficiency.

7.1.4 Non-Applicability of Regulations of Concern

The affected laminator is not subject to 35 IAC 218.301 or 218.302, Use of Organic Material. This non-applicability is based on 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating line (laminator) from these requirements.

7.1.5 Operational and Production Limits and Work Practices

- a. The affected laminator shall only be operated with natural gas as the fuel in the dryer and oxidizer.
- b. An oxidizer shall be in operation (mode 2) all times when non-compliant coatings are applied and affected laminator with dryer emitting VOM. The oxidizer shall not be seasonally shut down as would be allowed in 35 IAC 218.107.
- c. The permanent total enclosures installed on affected laminator and dryer are considered to meet the requirements of PTE which are established in 35 IAC 218, Appendix B, Procedure T and the capture efficiency of VOM is assumed to be 100 percent.
- d. The permanent total enclosure and an oxidizer shall be operated in a manner consistent to good air pollution control practices, including periodic inspection, routine maintenance and repair of defects.
- e. The Permittee shall replace the catalyst as needed in order to maintain the minimum required VOM destruction efficiency of an oxidizer.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide limitations in Condition 5.5.1, the affected laminator is subject to the following:

- a. Emissions and operation of the laminator shall not exceed the following limits:
 - i. Total hours of operation (Mode 1 and Mode 2 combined) shall not exceed 6,800 hr/yr.
 - ii. Total VOM emissions (Mode 1 and Mode 2 combined) shall not exceed 49.0 ton/yr.
 - iii. Total hourly average VOM emissions (Mode 1 and Mode 2 combined) shall not exceed 14.4 lb/hr.
- b. The above limitations were established in construction permit 92020035, pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current

month plus the preceding 11 months (running 12 month total)

7.1.7 Testing Requirements

- a. Upon reasonable request from the Illinois EPA or USEPA, testing to demonstrate compliance with the VOM content limitations for applied coatings shall be conducted in accordance with requirements and procedures of 35 IAC 218.105(a).
- b. Upon reasonable request from the Illinois EPA, the efficiency of the capture system and the control device shall be determined according to USEPA Reference Methods 25 or 25A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(c) through (f).

7.1.8 Monitoring Requirements

- a. Pursuant to 35 IAC 218.105(d)(2)(A), the Permittee shall use Illinois EPA and USEPA approved continuous monitoring equipment, which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment shall monitor the temperature rise across each catalytic oxidizer bed or VOM concentration of exhaust.
- b. Compliance Assurance Monitoring (CAM) Provisions:

The catalytic oxidizer used with affected laminator is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b)(1).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected laminator to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

FINAL DRAFT/PROPOSED CAAPP PERMIT
Amcor Flexibles Healthcare, Inc.
I.D. No.: 097115ABC
Application No.: 95120127
June 18, 2004

- a. A log of operating time of when compliant coatings are used and the catalytic oxidizer is shutdown.

FINAL DRAFT/PROPOSED CAAPP PERMIT
Amcor Flexibles Healthcare, Inc.
I.D. No.: 097115ABC
Application No.: 95120127
June 18, 2004

- b. Pursuant to 35 IAC 218.211(e)(2), the Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source:
 - i. Control device monitoring data;
 - ii. A log of operating time for the capture system, catalytic oxidizer, monitoring equipment and the associated coating line (laminator); and
 - iii. A maintenance log for the capture system, catalytic oxidizer and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- c. The name and identification number of each coating and cleanup solvent used.
- d. Monthly and annual usage of each coating, cleanup solvent, and any other VOM/HAP containing materials, in pounds or gallons.
- e. The weight of VOM/HAP per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM/HAP), as applied each month on the affected laminator.
- f. Density of each applied coating and cleanup solvent, in units lb/gal.
- g. The weight of VOM/HAP per volume of each cleanup solvent, in units lb/gallon, as applied each month on the affected coating line.
- h. The amount of solvent containing waste (off-site manifested waste from the coating and cleaning operations) generated and solvent reclaimed in units gallons/month.
- i. The average density lb/gal and Wt.% of VOM/HAP in generated solvent containing manifested waste.
- j. Total hours of operation per year of the affected laminator.
- k. Emissions calculated in accordance with the compliance procedures given in Condition 7.1.12 (ton/mo and ton/yr).

1. Fuel usage (mmft³/mo, mmft³/yr).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected laminator with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of VOM/HAP from the affected laminator in excess of the limits specified in Conditions 5.5.1, 5.5.3, and 7.1.6.
- b. Any record showing violation of 35 IAC 218.204(c) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- c. Pursuant to 35 IAC 218.211(e)(3), the Permittee shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 IAC 218.207 within 30 days of such an occurrence.
 - ii. At least 30 calendar days before changing the method of compliance from 35 IAC 218.207 to 35 IAC 218.204 or 205, the Permittee shall comply with all requirements of 35 IAC 218.211(c)(1) and (d)(1).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected laminator without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section and the emission limitations in Condition 5.5.1, 7.1.3, and 7.1.6 are not exceeded and the affected laminator remains in compliance with all applicable requirements.

7.1.12 Compliance Procedures

- a. To determine compliance with Condition 5.5.1 and 7.1.6, emissions from the affected laminator shall be calculated based on the following:

i. VOM/HAP emissions controlled by oxidizer

Controlled Emissions from Coating Operation (EI) = [Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM/HAP Content of the Coating (Wt.%)] x [100 - (overall control reduction/100)]

ii. VOM/HAP uncontrolled emissions

Controlled Emissions from Coating Operation (EII) = [Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM/HAP Content of the Coating (Wt.%)]

iii. Total VOM/HAP emissions

Total Emissions (E) = EI + EII - [Solvent Containing Waste (gal) x Waste Density (lb/gal) x VOM/HAP Content in Waste (Wt.%)]

- b. To determine compliance with Condition 5.5.1 emissions from natural gas combustion in the oxidizer and dryer shall be calculated based on the following emission factors and formulas:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/mmft³)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, Volume I, March, 1998.

Emissions (lb) = Natural gas consumed (mmft³) x the appropriate emission factor (lb/mmft³).

7.2 Flexographic Printing lines

7.2.1 Description

Flexographic presses are used to print flexible plastic packaging primarily used for the sterilization protection of medical devices. Emissions of volatile organic material (VOM) result from the use of printing-related materials such as inks and cleanup solvents. Exhaust fumes from printing presses and dryers utilized non-compliant inks are directed to the catalytic oxidizer, through a blower to the combustion section where VOM oxidation begins resulting in the destruction of VOM.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Flexographic Printing Lines	<u>Flexographic Printing Lines Using Compliant Inks</u> With Electric Dryers In-Lines: 101, 107, 110, 112, 113, 114, 115, 118 With Natural Gas Dryers Off-Lines Off-Lines: 36 and 42	None
	<u>Flexographic Printing Lines Using Non-Compliant Inks</u> Electric Dryer In-Lines: 111. Natural Gas Dryer Off-Lines: 42	Magnum Catalytic Oxidizer

7.2.3 Applicable Regulations

- An "affected printing line" for the purposes of these unit-specific conditions, is each piece of equipment described in Conditions 7.2.1 and 7.2.2.
- Each affected printing line is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of

particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- d. Pursuant to 35 IAC 218.401(a), no owner or operator of any affected flexographic printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either (d)(i) or (d)(ii) below:
 - i. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM); or
 - ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink.
- e. Pursuant to 35 IAC 218.401(c), no owner or operator of a subject flexographic printing line equipped with a capture system and control device shall operate the subject printing line unless the owner or operator meets the following below.
 - i. An incineration system is used which reduces the captured VOM emissions by at least 90 percent by weight, and
 - ii. The printing line is equipped with a capture system and control device that provides an overall reduction in VOM emissions of at least 60 percent.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. The affected printing lines are not subject to emission standards of 40 CFR Part 63, Subpart K "Printing and Publishing" because of the emission

limitations being established by Condition 5.4 of this permit.

7.2.5 Operational and Production Limits and Work Practices

- a. Dryers and an oxidizer, associated with affected printing line, shall only be operated with natural gas as the fuel.
- b. An oxidizer shall be in operation all times when non-compliant coatings are applied and affected printing line emitting VOM. The oxidizer shall not be seasonally shut down as would be allowed in 35 IAC 218.107.
- c. An oxidizer shall be operated in a manner consistent to good air pollution control practices, including periodic inspection, routine maintenance and repair of defects.
- d. The Permittee shall replace the catalyst as needed in order to maintain the minimum required VOM destruction efficiency of an oxidizer.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected printing lines are subject to the following:

- a. Emissions of VOM from 42 inch offline press, press 118, and press 115 shall not exceed 24.9 tons/yr.

The above limitations were established in construction permit 96060090, pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- b. Emissions and operation of the Magnum Catalytic Oxidizer shall not exceed the following limits:

Firing Rate (mmBtu/hr)	NO _x Emissions		CO Emissions	
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
5.3	0.53	2.32	0.11	0.48

The above limitations were established in construction permit 95080063, pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned permit does not constitute a new major source or major modification

pursuant to Title I of the CAA, specifically 35 IAC
Part 203 [T1].

7.2.7 Testing Requirements

- a. Upon reasonable request from the Illinois EPA or USEPA, testing to demonstrate compliance with the VOM content limitations for applied inks shall be conducted in accordance with requirements and procedures of 35 IAC 218.105(a).
- b. Upon reasonable request from the Illinois EPA, the efficiency of the capture system and the control device shall be determined according to USEPA Reference Methods 25 or 25A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(c) through (f).

7.2.8 Monitoring Requirements

- a. Pursuant to 35 IAC 218.105(d)(2)(A), the Permittee shall use Illinois EPA and USEPA approved continuous monitoring equipment, which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment shall monitor the temperature rise across each catalytic oxidizer bed or VOM concentration of exhaust.
- b. Compliance Assurance Monitoring (CAM) Provisions:

The catalytic oxidizer used with affected printing line is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b)(1).

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5 and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of inks and cleaning solvents pursuant to Condition 7.2.7(a), which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- b. A log of operating time of when compliant inks are used and when the catalytic oxidizer is shutdown.
- c. Control device:
 - i. Control device monitoring data;
 - ii. A log of operating time for the capture system, catalytic oxidizer, monitoring equipment and the associated printing; and
 - iii. A maintenance log for the capture system, catalytic oxidizer and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- d. The name and identification number of each coating, ink, and clean-up solvent as applied on each printing line;
- e. The VOM/HAP content and the volume of each coating, ink, and clean-up solvent as applied each day on each printing line in terms of % VOM/HAP by weight and accompanied by a copy of supporting information, e.g., supplier data sheet or laboratory analysis report;
- f. The amount of solvent containing waste (off-site manifested waste from the coating and cleaning operations) generated and solvent reclaimed in units gallons/month;
- g. The average density lb/gal and Wt.% of VOM/HAP in generated solvent containing manifested waste;
- h. Records of the fuel usage for the affected printing lines (mmft³/mo, mmft³/yr);

- i. VOM/HAP emissions from the affected printing lines, as calculated from condition 7.2.12 (tons/mo, tons/yr); and
- j. NO_x, PM, SO₂, and VOM emissions (as a result of natural gas combustion), as calculated from condition 7.2.12 (tons/mo, tons/yr).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of affected printing line with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Pursuant to 35 IAC 218.404(e)(3)(A), the owner or operator of a subject printing line shall notify the Illinois EPA of any record showing violation of Condition 7.2.3 (see also 35 IAC 218.401(b) and 218.401(c)), and shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- b. Emissions of VOM or ink usage in excess of the limits in Conditions 7.2.3 and/or 7.2.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of inks or cleaning solvents on the affected printing lines, provided that the Permittee continues to comply with the Conditions 7.2.3 and 7.2.6 of this permit.

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. To determine compliance with Condition 5.5.1 and 7.2.6, emissions from the affected printing lines shall be calculated based on the following:
- i. Uncontrolled Emissions (EI):

$$\text{VOM/HAP (lb)} = (\text{Ink Usage, gal}) \times (\text{VOM Content of Ink lb/gal})$$
 - ii. Controlled Emissions (EII):

$$\text{VOM/HAP (lb)} = (\text{Ink Usage, gal}) \times (\text{VOM/HAP Content of Ink, lb/gal}) \times [100 - (\text{overall reduction efficiency}/100)]$$
 - iii. Total VOM/HAP emissions:

$$\text{Total Emissions (E)} = \text{EI} + \text{EII} - [\text{Solvent Containing Waste (gal)} \times \text{Waste Density (lb/gal)} \times \text{VOM/HAP Content in Waste (Wt.\%)}]$$
- b. To determine compliance with Condition 5.5.1, emissions from the incinerator and natural gas fired dryers of affected printing lines shall be calculated based on the following emission factors and formulas:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/mmft³)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, Volume I, March, 1998.

Emissions (lb) = Natural gas consumed (mmft³) x the appropriate emission factor (lb/mmft³).

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

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Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois, 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

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9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-

based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing

of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of

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the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1. Attachment 1 - Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A (P)^B$$

Where:

P = Process weight rate;

E = Allowable emission rate; and,

- i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

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Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

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10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Compliance Assurance Monitoring (CAM) Plan

Table 1 - PSEU Designation:	Laminator 501; Presses 042/111
Pollutant:	VOM

Indicators:	#1: Oxidizer's Temperature	#2: N/A
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Continuous Temperature Monitoring	N/A
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Normal range: 800 ^o - 1000 ^o F across the catalytic bed	N/A
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	No more than 9 of 180 days of operation outside of indicator range established above	N/A

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Data plotted on continuous data recorder located by laminator or printing press. Oxidizer specifications kept on file.	N/A
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Visual check of data display	N/A
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Visual check of continuous recorder	N/A
THE MONITORING FREQUENCY:	Continuous	N/A
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Chart collected and storage	N/A
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	N/A	N/A

10.4 Attachment 4 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification

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- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents		
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

Authorized Signature: _____

BY: _____

AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
----------------------	--------------------

AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
----------------------	--------------------

TYPED OR PRINTED NAME OF SIGNATORY _____ DATE _____

TYPED OR PRINTED NAME OF SIGNATORY _____ DATE _____

10.6 Attachment 6 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
 - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

FINAL DRAFT/PROPOSED CAAPP PERMIT
Amcor Flexibles Healthcare, Inc.
I.D. No.: 097115ABC
Application No.: 95120127
June 18, 2004

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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